

1    Carl L. Blumenstein (CA Bar No. 124158)  
2    NOSSAMAN LLP  
3    50 California Street, 34th Floor  
4    San Francisco, CA 94111  
5    Telephone: (415) 398-3600  
6    Facsimile: (415) 398-2438  
7    Email: [cblumenstein@nossaman.com](mailto:cblumenstein@nossaman.com)

5 || Defendants' Liaison Counsel

6 Philip J. Iovieno (admitted *pro hac vice*)  
7 BOIES, SCHILLER & FLEXNER LLP  
8 30 South Pearl Street, 11th Floor  
9 Albany, NY 12207  
Telephone: (518) 434-0600  
Facsimile: (518) 434-0665  
Email: [piovieno@bsfllp.com](mailto:piovieno@bsfllp.com)

10 || Attorneys for Certain Direct Action Plaintiffs

11 || [additional counsel listed on the signature page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION**

CASE NO. M:07-md-01827-SI

MDL NO. 1827

## This Document Relates to:

CASE NOS. 3:10-cv-05458-SI;

*SB Liquidation Trust v. AU Optronics Corp., et al.*, 3:10-cv-05458-SI

CASE NOS. 3:10-cv-05458-SI;  
3:11-cv-0829-SI; 3:11-cv-02225-SI;  
3:11-cv-03763-SI; 3:11-cv-03856-SI;  
3:11-cv-04119-SI; 3:11-cv-05765-SI;  
3:11-cv-05781-SI; 3:11-cv-06241-SI;  
3:12-cv-01426-SI; 3:10-cv-05625-SI

*MetroPCS Wireless, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-00829-SI

**STIPULATION AND [PROPOSED]  
ORDER REGARDING TRACK 2  
EXPERT DEPOSITIONS AND  
DAUBERT MOTIONS SCHEDULE**

*Office Depot, Inc. v. AU Optronics Corp., et al.*, 3:11-cv-02225-SI

**STIPULATION AND [PROPOSED] ORDER  
REGARDING TRACK 2 EXPERT DEPOSITIONS  
AND DAUBERT MOTIONS SCHEDULE**

CASE NO. M:07-MD-01827-SI

1      *Interbond Corp. of America v. AU Optronics*  
 2      *Corp., et al.*, 3:11-cv-03763-SI

3      *Schultze Agency Services, LLC, on behalf of*  
 4      *Tweeter Opco, LLC and Tweeter Newco, LLC,*  
 5      *v. AU Optronics Corp., et al.*,  
 6      3:11-cv-03856-SI

7      *P.C. Richard & Son Long Island Corp., et al.*  
 8      *v. AU Optronics Corp., et al.*, 3:11-cv-04119-  
 9      SI

10     *Tech Data Corp., et al. v. AU Optronics Corp.,*  
 11     *et al.*, 3:11-cv-05765-SI

12     *The AASI Creditor Liquidating Trust, by and*  
 13     *through Kenneth A. Welt, Liquidating Trustee*  
 14     *v. AU Optronics Corp., et al.*, 3:11-cv-05781-  
 15     SI

16     *CompuCom Systems, Inc. v. AU Optronics*  
 17     *Corp., et al.*, 3:11-cv-06241-SI

18     *NECO Alliance LLC v. AU Optronics Corp., et*  
 19     *al.*, 3:12-cv-01426-SI

20     *Alfred H. Siegel, as Trustee of the Circuit City*  
 21     *Stores, Inc. Liquidating Trust v. AU Optronics*  
 22     *Corp., et al.*, 3:10-cv-05625-SI

16  
 17       Plaintiffs and Defendants in the above-captioned cases (collectively, the “Parties”) state as  
 18 follows:

19       The Parties have met and conferred in good faith regarding the scheduling of Plaintiffs’  
 20 experts’ depositions, and recognize that the experts’ schedules make it difficult to hold  
 21 depositions during the time period set out in the Stipulation and Order Regarding Summary  
 22 Judgment Schedule (entered January 28, 2014) (“Scheduling Order”); and

23       The Parties have agreed to a one week extension to the deadline for expert depositions and  
 24 *Daubert* motions to accommodate Plaintiffs’ experts’ schedules;

25       NOW, THEREFORE, THE PARTIES STIPULATE AND AGREE that, subject to the  
 26 Court’s concurrence and availability, that the Scheduling Order is amended such that the  
 27 following schedule will apply to the rebuttal depositions of Plaintiffs’ experts and to any *Daubert*  
 28

1 motions filed by Defendants as to Plaintiffs' experts Dr. Bernheim, Dr. Marx, Dr. Fontecchio, and  
 2 Mr. Stowell:

Last day to hold depositions of Dr. Bernheim, Dr. Fontecchio, and Mr. Stowell	May 12, 2014
Last day to file <i>Daubert</i> motions	June 5, 2014
Last day to file oppositions to <i>Daubert</i> motions	July 17, 2014
Last day to file reply briefs in support of <i>Daubert</i> motions	August 28, 2014
Hearing on <i>Daubert</i> motions	September 12, 2014

9 The Parties do not intend any other amendment to the Scheduling Order.

10  
11 Dated: April 4, 2014

12 Respectfully submitted,

13  
14 By: /s/ Philip J. Iovieno  
15 William Isaacson (admitted *pro hac vice*)  
16 BOIES, SCHILLER & FLEXNER LLP  
17 5301 Wisconsin Avenue NW, Suite 800  
18 Washington, DC 20015  
Telephone: (202) 237-2727  
Facsimile: (202) 237-6131  
Email: wisaacson@bsfllp.com

19 Philip J. Iovieno (admitted *pro hac vice*)  
20 Anne M. Nardacci (admitted *pro hac vice*)  
21 BOIES, SCHILLER & FLEXNER LLP  
22 30 South Pearl Street, 11th Floor  
Albany, NY 12207  
Telephone: (518) 434-0600  
Facsimile: (518) 434-0665  
Email: piovieno@bsfllp.com  
anardacci@bsfllp.com

23  
24 Attorneys for Plaintiffs MetroPCS Wireless, Inc.;  
Office Depot, Inc.; Interbond Corp. of America;  
Schultze Agency Services, LLC; P.C. Richard & Son  
Long Island Corporation; MARTA Cooperative of  
America, Inc.; ABC Appliance Inc.; Tech Data Corp.  
and Tech Data Product Management, Inc.; The AASI  
Creditor Liquidating Trust; CompuCom Systems, Inc.;  
and NECO Alliance LLC

1 By: /s/ Scott N. Wagner

2 Robert W. Turken  
3 Mitchell E. Widom  
4 Scott N. Wagner  
5 BILZIN SUMBERG BAENA PRICE & AXELROD  
6 LLP  
7 1450 Brickell Avenue, Suite 2300  
8 Miami, FL 33131-3456  
Telephone: (305) 374-7580  
Facsimile: (305) 374-7593  
Email: rturken@bilzin.com  
mwidom@bilzin.com  
swagner@bilzin.com

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
*Attorneys for Plaintiffs Tech Data Corp. and Tech  
Data Product Management, Inc. and The AASI  
Creditor Liquidating Trust*

By: /s/ H. Lee Godfrey

H. Lee Godfrey  
Kenneth S. Marks  
Jonathan J. Ross  
Johnny W. Carter  
SUSMAN GODFREY L.L.P.  
1000 Louisiana Street, Suite 5100  
Houston, TX 77002  
Telephone: (713) 651-9366  
Facsimile: (713) 654-6666  
Email: lgodfrey@susmangodfrey.com  
kmarks@susmangodfrey.com  
jross@susmangodfrey.com  
jcarter@susmangodfrey.com

Parker C. Folse III  
Rachel S. Black  
Jordan Connors  
SUSMAN GODFREY L.L.P.  
1201 Third Avenue, Suite 3800  
Seattle, WA 98101-3000  
Telephone: (206) 516-3880  
Facsimile: (206) 516-3883  
Email: pfolse@susmangodfrey.com  
rblack@susmangodfrey.com  
jconnors@susmangodfrey.com

*Attorneys for Plaintiff Alfred H. Siegel, as Trustee of  
the Circuit City Stores, Inc. Liquidating Trust*

1 By: /s/ Marc M. Seltzer  
2 Marc M. Seltzer (54534)  
3 Steven G. Sklaver (237612)  
4 SUSMAN GODFREY LLP  
5 1901 Avenue of the Stars, Suite 950  
6 Los Angeles, CA 90067-6029  
7 Telephone: (310) 789-3100  
8 Facsimile: (310) 789-3150  
9 Email: mseltzer@susmangodfrey.com  
ssklaver@susmangodfrey.com

10 Erica W. Harris  
11 SUSMAN GODFREY LLP  
12 1000 Louisiana, Suite 5100  
13 Houston, TX 77002-5096  
14 Telephone: (713) 651-9366  
15 Facsimile: (713) 654-6666  
16 Email: eharris@susmangodfrey.com

17 *Attorneys for SB Liquidation Trust*

18 By: /s/ James B. Baldinger  
19 James B. Baldinger  
20 Florida Bar No.: 869899  
jbalddinger@carltonfields.com  
Robert L. Ciotti  
Florida Bar No.: 333141  
rciotti@carltonfields.com  
David B. Esau  
Florida Bar No.: 650331  
desau@carltonfields.com  
CARLTON FIELDS, P.A.  
CityPlace Tower – Suite 1200  
525 Okeechobee Boulevard  
West Palm Beach, Florida 33401  
Telephone: (561) 659-7070  
Facsimile: (561) 659-7368

21 *Counsel for TracFone Wireless, Inc.*

1 By: /s/ Lee F. Berger  
2 Holly A. House (State Bar No. 136045)  
3 Kevin C. McCann (State Bar No. 120874)  
4 Lee F. Berger (State Bar No. 222756)  
5 Sean Unger (State Bar No. 231694)  
6 PAUL HASTINGS LLP  
7 55 Second Street  
8 Twenty-Fourth Floor  
9 San Francisco, CA 94105  
10 Telephone: (415) 856-7000  
11 Facsimile: (415) 856-7100  
12 Email: kevinmccann@paulhastings.com  
13 hollyhouse@paulhastings.com  
14 leeberger@paulhastings.com  
15 seanunger@paulhastings.com

16 Brad D. Brian (State Bar No. 079001)  
17 Jerome C. Roth (State Bar No. 159483)  
18 MUNGER, TOLLES & OLSON LLP  
19 355 South Grand Avenue  
20 Los Angeles, CA 90071-1560  
21 Telephone: (213) 683-9100  
22 Facsimile: (213) 687-3702  
23 Email: Brad.Brian@mto.com

24 *Attorneys for Defendants LG Display Co., Ltd. and LG  
25 Display America, Inc.*

26 By: /s/ Stephen P. Freccero  
27 Melvin R. Goldman (SBN 34097)  
28 Stephen P. Freccero (SBN 131093)  
1 Derek F. Foran (SBN 224569)  
2 MORRISON & FOERSTER LLP  
3 425 Market Street  
4 San Francisco, CA 94105  
5 Telephone: (415) 268-7000  
6 Facsimile: (415) 268-7522  
7 Email: mgoldman@mofo.com  
8 sfreccero@mofo.com  
9 dforan@mofo.com

10 *Attorneys for Defendants Epson Imaging Devices  
11 Corporation and Epson Electronics America, Inc.*

1 By: /s/ Carl L. Blumenstein  
2 Carl L. Blumenstein (State Bar No. 124158)  
3 Christopher A. Nedeau (State Bar No. 81297)  
4 Farschad Farzan (State Bar No. 215194)  
5 NOSSAMAN LLP  
6 50 California Street, 34th Floor  
7 San Francisco, CA 94111  
8 Telephone: (415) 398-3600  
9 Facsimile: (415) 398-2438  
10 Email: cnedea@nossaman.com  
11 cblumenstein@nossaman.com  
12 ffarzan@nossaman.com

13 *Attorneys for Defendants AU Optronics Corporation*  
14 *and AU Optronics Corporation America*

15 By: /s/ Christopher M. Curran  
16 Christopher M. Curran (*pro hac vice*)  
17 Martin M. Toto (*pro hac vice*)  
18 John H. Chung (*pro hac vice*)  
19 WHITE & CASE LLP  
20 1155 Avenue of the Americas  
21 New York, NY 10036  
22 Telephone: (212) 819-8200  
23 Facsimile: (212) 354-8113  
24 Email: ccurran@whitecase.com  
25 mtoto@whitecase.com  
26 jchung@whitecase.com

27 *Attorneys for Toshiba Corporation, Toshiba Mobile*  
28 *Display Co., Ltd., Toshiba America Electronic*  
29 *Components, Inc. and Toshiba America Information*  
30 *Systems, Inc.*

1 By: /s/ Neal A. Potischman

2 Neal A. Potischman (SBN 254862)  
3 neal.potischman@davispolk.com  
4 DAVIS POLK & WARDWELL LLP  
5 1600 El Camino Real  
Menlo Park, California 94025  
Telephone: (650) 752-2000  
Facsimile: (650) 752-2111

6 *Counsel for Defendants Chi Mei Optoelectronics*  
7 *Corp. (n/k/a Innolux Corporation), Chi Mei*  
8 *Optoelectronics USA, Inc., and CMO Japan Co., Ltd.*  
9 *for the Office Depot, Inc., Interbond Corp. of America,*  
*Schultze Agency Services, LLC, P.C. Richard & Son*  
*Long Island Corp., et al., Tech Data Corp., et al., The*  
*AASI Creditor Liquidating Trust, CompuCom Systems,*  
*Inc., and NECO Alliance LLC Actions Only*

10 /s/ Michael R. Scott

11 Michael R. Scott (pro hac vice)  
mrs@hcmp.com  
12 Michael J. Ewart (pro hac vice)  
mje@hcmp.com  
HILLIS CLARK MARTIN & PETERSON P.S.  
13 1221 Second Avenue, Suite 500  
Seattle, WA 98101-2925  
14 Telephone: (206) 623-1745  
Facsimile: (206) 623-7789

15 *Counsel for Chi Mei Optoelectronics Corporation*  
16 *(n/k/a Innolux Corporation), CMO Japan Co., Ltd.,*  
17 *and Chi Mei Optoelectronics USA, Inc. for the*  
*MetroPCS Wireless, Inc. Action Only*

18 By: /s/ William S. Farmer

19 William S. Farmer (SBN 46694)  
David C. Brownstein (SBN 141929)  
20 Jacob P. Alpren (SBN 235713)  
Farmer Brownstein Jaeger LLP  
21 235 Pine Street, Suite 1300  
San Francisco, CA 94104  
22 Telephone: (415) 795-2050  
Email: wfarmer@fbj-law.com  
dbrownstein@fbj-law.com  
jalpren@fbj-law.com

23 *Counsel for Chunghwa Picture Tubes, Ltd. in the*  
24 *MetroPCS Wireless Action Only*

1 By: /s/ Rachel S. Brass  
2 Rachel S. Brass (SBN 219301)  
3 Joel S. Sanders (SBN 107234)  
4 Austin V. Schwing (SBN 211696)  
5 GIBSON, DUNN & CRUTCHER LLP  
6 555 Mission Street, Suite 3000  
7 San Francisco, California 94105  
8 (415) 393-8200 / (415) 393-8306  
9 *jsanders@gibsondunn.com*  
*rbrass@gibsondunn.com*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

*Attorneys for Defendants Chunghwa Picture Tubes,  
Ltd. in the Office Depot, Jaco Electronics, TracFone,  
Interbond, Schultze Agency Services, PC Richard,  
Tech Data, AASI Creditor Liquidating Trust, and  
CompuCom Actions Only*

By: /s/ Harrison J. Frahn IV  
James G. Kreissman (SBN 206740)  
Harrison J. Frahn IV (SBN 206822)  
Jason M. Bussey (SBN 227185)  
Elizabeth A. Gillen (SBN 260667)  
Melissa D. Schmidt (SBN 266487)  
SIMPSON THACHER & BARTLETT LLP  
2475 Hanover St.  
Palo Alto, California 94304  
Telephone: (650) 251-5000  
Facsimile: (650) 251-5001  
*jkreissman@stblaw.com*  
*hfrahn@stblaw.com*  
*jbussey@stblaw.com*  
*egillen@stblaw.com*  
*melissa.schmidt@stblaw.com*

*Attorneys for Defendant HannStar Display  
Corporation*

1 By: /s/ Jacob R. Sorensen  
2 Jacob R. Sorensen (SBN 209134)  
3 John M. Grenfell (SBN 88500)  
4 Fusae Nara (*pro hac vice*)  
5 Andrew D. Lanphere (SBN 191479)  
6 PILLSBURY WINTHROP SHAW PITTMAN LLP  
7 Four Embarcadero Center, 22nd Floor  
8 San Francisco, CA 94111  
9 Telephone: (415) 983-1000  
10 Facsimile: (415) 983-1200  
11 Email: john.grenfell@pillsburylaw.com  
12 jake.sorensen@pillsburylaw.com  
13 fusae.nara@pillsburylaw.com  
14 andrew.lanphere@pillsburylaw.com

15 *Attorneys for Defendants Sharp Corporation and*  
16 *Sharp Electronics Corporation*

17 By: /s/ Kent M. Roger  
18 Kent M. Roger (Bar No. 95987)  
19 MORGAN LEWIS & BOCKIUS LLP  
20 One Market, Spear Street Tower  
21 San Francisco, CA 94105-1126  
22 Telephone: (415) 442-1000  
23 Facsimile: (415) 442-1001  
24 Email: kroger@morganlewis.com

25 *Attorneys for Defendants Hitachi, Ltd., Hitachi*  
26 *Displays, Ltd. (n/k/a Japan Display Inc.) and Hitachi*  
27 *Electronic Devices (USA), Inc.*

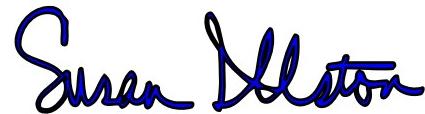
28 By: /s/ Stephen Holbrook Sutro  
1 George Dominic Niespolo  
2 Stephen Holbrook Sutro  
3 DUANE MORRIS LLP  
4 One Market , Spear Tower, Suite 2200  
5 San Francisco, CA 94105  
6 Telephone: (415) 957-3010  
7 Facsimile: (415) 957-3001  
8 Email: gdniespolo@duanemorris.com  
9 shsutro@duanemorris.com

10 *Attorneys for NEC Corporation, NEC LCD*  
11 *Technologies, Ltd., and Renesas Electronics America,*  
12 *Inc.*

1 Pursuant to General Order No. 45, § X-B, the filer attests that concurrence in the filing of this  
2 document has been obtained from each of the above signatories.

3 **IT IS SO ORDERED.**

4  
5 Dated: 4/7/14



---

6 Hon. Susan Illston  
7 United States District Judge

8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28